

Mr. Grant McGuire
R.R. Donnelley & Sons, Company
P.O. Box 837
Warsaw, IN 46581

Re: 085-11652
Modification to Significant Source Modification
No.: 085-10668-00009

Dear Mr. McGuire:

R.R. Donnelley & Sons, Company applied for a Part 70 operating permit on June 3, 1996 for a stationary printing press facility. An application to modify this source by installing one (1) parts washer and one (1) cylinder washer was received on February 17, 1999. Pursuant to the provisions of 326 IAC 2-7-10.5 the following units were approved for construction and operation at the source on July 22, 1999:

- (a) One (1) parts washer, identified as WGPW, with a maximum solvent consumption of 13,850 gallons per year, located within a permanent total enclosure with emissions routed to the existing carbon adsorption system for volatile organic compound emissions, exhausting to stack ID # 2/2; and
- (b) One (1) cylinder washer, identified as WCWM, with a maximum solvent consumption of 19,500 gallons per year, located within a permanent total enclosure with emissions routed to the existing carbon adsorption system for volatile organic compound emissions, exhausting to stack ID # 2/2.

On December 9, 1999, R.R. Donnelley & Sons, Company- Warsaw, Indiana filed an appeal to the significant source modification issued for the above listed emission units. The source has requested that the HAPs limit for the above listed emission units be removed because National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR 63, Subpart KK) and not MACT was applicable to those units. So conditions C.12(d), D.1.2, D.1.5, D.1.6, D.1.7, D.1.8(a), D.1.9(a) and D.1.10 shall be amended as follows(changes in bold):

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (d) The first report shall cover the period commencing on the date of **operation issuance** of ~~this approval~~ and ending on the last day of the reporting period.

D.1.2 Hazardous Air Pollutants (HAP) [326 IAC 2-4.1-1 **40 CFR 63, Subpart KK**]

~~The amount of single and total HAPs delivered to the parts and cylinder washers shall be limited to less than 10 and 25 tons per 12 month period, rolled on a monthly basis, respectively, utilizing a carbon adsorption system with 98% control efficiency. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification, from the parts and cylinder washers that would increase in source wide single and total HAP emissions to more than 10 and 25 tons per year, shall obtain approval from the Office of Air Management (OAM), as required by 326 IAC 2-1 before such change can occur.~~

The parts and cylinder washers are subject to the Printing and Publishing NESHAP, 40 CFR 63, Subpart KK. Accordingly, the facilities are excluded from applicability of the New Source Toxics Control regulation pursuant to 326 IAC 2-4.1-1(b)(2). The amount of total HAPs emitted from the NESHAP affected source (all gravure related operations) shall be limited to no more than 8% of the volatile matter used each month.

D.1.3 Volatile Organic Compounds (VOCs)

- (a) The amount of VOC usage by the parts and cylinder washers shall not exceed 500 tons per 12 month period, rolled on a monthly basis. When operating the carbon adsorption system to achieve this limit, the carbon adsorption system shall maintain an overall control efficiency of 98% per 12 month period, rolled on a monthly basis. This usage limit will be equivalent to limiting the VOC emissions to less than 10 tons per twelve month period, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.
- (b) In event that the carbon adsorption system is not operating, the amount of VOC usage by the parts and cylinder washers shall be limited such that the VOC usage with the carbon adsorption system operating times 0.02 added to the VOC usage with carbon adsorption system not operating shall not exceed VOC emission of 10 tons per twelve month period, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

D.1.3 1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the HAP limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 1.6 Hazardous Air Pollutants (HAP)[40 CFR 63, Subpart KK]

~~The carbon adsorption unit for HAP control shall be in operation at all times when the parts and cylinder washers are in operation.~~ **The parts and cylinder washers shall be operated as part of the affected source for the Printing and Publishing NESHAP, which includes the publication rotogravure presses and all affiliated equipment, including proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, including proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment at a facility. The facility shall demonstrate compliance with the HAP emission limitations from the affected source per the requirements of 40 CFR 63.824.**

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 1.7 Carbon Adsorbers

- (a) At all times that the **carbon adsorption** control system for the parts and cylinder washers ~~are~~ **is** in operation and being utilized to demonstrate compliance of the affected

~~source with the limitations set forth in Condition D.1.2. The control system shall be operated such that:~~

~~(b1) Performing a liquid-liquid material balance of the affected source for each month; as detailed in 40 CFR Part 63.824(b)(1)(i).~~

Or

~~(b 2) Using continuous emission monitors, conducting an initial performance test of capture efficiency, and continuously monitoring a site specific operating parameter to assure the capture efficiency as specified in 40 CFR Part 63.824(b)(1)(ii).~~

~~(c) The source can comply with this condition by keeping the record of the malfunction reports of the systems conveying the exhaust gases from the enclosures; and other malfunction reports of the presses, when the systems conveying the exhaust gases from the enclosures to the adsorber, are not operating but the presses in the respective enclosures are in operation.~~

(b) At all times that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate compliance with the VOC emission limitations, the control system shall be monitored using the inlet and outlet analyzers on the carbon adsorption system and monitoring the pressure differential in the enclosure to meet permanent total enclosure requirements.

D.4.7 1.8 Carbon Adsorption Unit Inspections

An inspection shall be performed each calendar quarter of the carbon adsorption unit controlling the parts and cylinder washers. All defective beds shall be **repaired or replaced**. **The Permittee is not required to shut down the system in order to conduct the quarterly inspection.** The Permittee shall monitor and inspect the carbon adsorption solvent recovery system and the ducted solvent capture system to ensure proper operation and maintenance.

D.4.8 1.9 Carbon Adsorption Failure Detection

In the event that a failure on the carbon adsorber has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For the carbon adsorber, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.91.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, **D.1.3** and ~~D.1.6~~ **D.1.7**, the Permittee shall maintain records in accordance with (1) through (3). Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish

compliance with the HAP/VOC usage limits and/or the HAP VOC emission limits established in Condition D.1.2 and D.1.3, and ~~temperature limit~~ **the control system monitoring requirements** established in Condition ~~D.1.6~~ **D.1.7**.

- (1) The total VOC/HAP usage for each month; and the weight of VOC/HAPs emitted for each compliance period.
 - (2) The monthly average recovery efficiency for the carbon adsorption recovery system.
 - (3) ~~The malfunction reports of the permanent total enclosure or the carbon adsorption recovery system.~~ **The amount of VOC usage for each month when the carbon adsorption system is not operating.**
 - (4) **Other applicable record keeping requirements as specified in 40 CFR 63.829 to demonstrate compliance with 40 CFR 63.824 and condition D.1.2.**
- (b) To document compliance with Condition ~~D.1.7~~ **D.1.8**, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.1.7~~ **D.1.8**.

~~D.1.10~~ **1.11 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Shantanu Pahi, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Shantanu Pahi or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments: Amended Significant Source Modification Pages (5 Pages.)

Spahi

cc: File - Kosciusko County
U.S. EPA, Region V
Northern Regional Office
Kosciusko County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**R. R. Donnelley & Sons Company
2801 W. Old Road 30
Warsaw, Indiana 46581**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 085-10668-00009	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: July 22, 1999

Modification No.: 085-11652-00009		Pages Affected: 2, 10, 11, 12 and 13
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:	

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Certification Quarterly Reports (2)

SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary printing press facility.

Responsible Official: Grant McGuire
Source Address: 2801 W. Old Road 30, Warsaw, IN 46581
Mailing Address: P.O. Box 837, Warsaw, IN 46581-0837
Phone Number: (219) 267-9460
SIC Code: 2754
County Location: Kosciusko
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) parts washer, identified as WGPW, with a maximum solvent consumption of 13,850 gallons per year, located within a permanent total enclosure with emissions routed to the existing carbon adsorption system for volatile organic compound emissions, exhausting to stack ID # 2/2; and
- (b) One (1) cylinder washer, identified as WCWM, with a maximum solvent consumption of 19,500 gallons per year, located within a permanent total enclosure with emissions routed to the existing carbon adsorption system for volatile organic compound emissions, exhausting to stack ID # 2/2.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Unless otherwise stated in Section D of this permit, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval or as approved by IDEM, OAM, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this approval. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.10 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and

- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of operation and ending on the last day of the reporting period.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) parts washer, identified as WGPW, with a maximum solvent consumption of 13,850 gallons per year, located within a permanent total enclosure with emissions routed to the existing carbon adsorption system for volatile organic compound emissions, exhausting to stack ID # 2/2; and
- (b) One (1) cylinder washer, identified as WCWM, with a maximum solvent consumption of 19,500 gallons per year, located within a permanent total enclosure with emissions routed to the existing carbon adsorption system for volatile organic compound emissions, exhausting to stack ID # 2/2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.2 Hazardous Air Pollutants (HAPs) [40 CFR 63, Subpart KK]

The parts and cylinder washers are subject to the Printing and Publishing NESHAP, 40 CFR 63, Subpart KK. Accordingly, the facilities are excluded from applicability of the New Source Toxics Control regulation pursuant to 326 IAC 2-4.1-1(b)(2). The amount of total HAPs emitted from the NESHAP affected source (all gravure related operations) shall be limited to no more than 8% of the volatile matter used each month.

D.1.3 Volatile Organic Compounds (VOCs)

- (a) The amount of VOC usage by the parts and cylinder washers shall not exceed 500 tons per 12 month period, rolled on a monthly basis. When operating the carbon adsorption system to achieve this limit, the carbon adsorption system shall maintain an overall control efficiency of 98% per 12 month period, rolled on a monthly basis. This usage limit will be equivalent to limiting the VOC emissions to less than 10 tons per twelve month period, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.
- (b) In event that the carbon adsorption system is not operating, the amount of VOC usage by the parts and cylinder washers shall be limited such that the VOC usage with the carbon adsorption system operating times 0.02 added to the VOC usage with carbon adsorption system not operating shall not exceed VOC emission of 10 tons per twelve month period, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the HAP limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Hazardous Air Pollutants (HAPs)[40 CFR 63, Subpart kk]

The parts and cylinder washers shall be operated as part of the affected source for the Printing and Publishing NESHAP, which includes the publication rotogravure presses and all affiliated equipment, including proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, including proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment at a facility. The facility shall demonstrate compliance with the HAP emission limitations from the affected source per the requirements of 40 CFR 63.824.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Carbon Adsorbers

(a) At all times that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate compliance of the affected source:

(1) Performing a liquid-liquid material balance of the affected source for each month;

Or

(2) Using continuous emission monitors, conducting an initial performance test of capture efficiency, and continuously monitoring a site specific operating parameter to assure the capture efficiency as specified in 40 CFR Part 63.824(b)(1)(ii).

(b) At all times that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate compliance with the VOC emission limitations, the control system shall be monitored using the inlet and outlet analyzers on the carbon adsorption system and monitoring the pressure differential in the enclosure to meet permanent total enclosure requirements.

D.1.8 Carbon Adsorption Unit Inspections

An inspection shall be performed each calendar quarter of the carbon adsorption unit controlling the parts and cylinder washers. All defective beds shall be repaired or replaced. The Permittee is not required to shut down the system in order to conduct the quarterly inspection. The Permittee shall monitor and inspect the carbon adsorption solvent recovery system and the ducted solvent capture system to ensure proper operation and maintenance.

D.1.9 Carbon Adsorption Failure Detection

In the event that a failure on the carbon adsorber has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, D.1.3 and D.1.7, the Permittee shall maintain records in accordance with (1) through (3). Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP/VOC usage limits and VOC emission limits established in Condition D.1.2 and D.1.3, and the control system monitoring requirements established in Condition D.1.7.
 - (1) The total VOC/HAP usage for each month; and the weight of VOC emitted for each compliance period.
 - (2) The monthly average recovery efficiency for the carbon adsorption recovery system.
 - (3) The amount of VOC usage for each month when the carbon adsorption system is not operating.
 - (d) Other applicable record keeping requirements as specified in 40 CFR 63.829 to demonstrate compliance with 40 CFR 63.824 and condition D.1.2.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: R. R. Donnelley & Sons, Company
Source Address: 2801 W. Old Road 30, Warsaw, IN 46581
Mailing Address: P. O. Box 837, Warsaw, IN 46581-0837
Source Modification No.:089-10668-00009

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: R. R. Donnelley & Sons, Company
Source Address: 2801 W. Old Road 30, Warsaw, IN 46581
Mailing Address: P. O. Box 837, Warsaw, IN 46581-0837
Source Modification No.: 089-10668-00009
Facility: Parts and Cylinder Washers
Parameter: Single hazardous air pollutants (HAPs)
Limit: The single HAP usage is limited to less than 10 tons per twelve (12) month period, rolled on a monthly basis. During the first 11 months of this permit, the single HAP usage shall be limited such that the total single HAP usage divided by the accumulated months of operation shall not exceed 0.8325 tons per month.

YEAR: _____

Month	Total Single HAP Emissions This Month (tons)	Previous 11 Month Single HAP Emissions (tons)	12 Month Total Single HAP Emissions (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: R. R. Donnelley & Sons, Company
Source Address: 2801 W. Old Road 30, Warsaw, IN 46581
Mailing Address: P. O. Box 837, Warsaw, IN 46581-0837
Source Modification No.: 089-10668-00009
Facility: Parts and Cylinder Washers
Parameter: Total hazardous air pollutants (HAPs)
Limit: The total HAP usage is limited to less than 25 tons per twelve (12) month period, rolled on a monthly basis. During the first 11 months of this permit, the total HAP usage shall be limited such that the total HAP usage divided by the accumulated months of operation shall not exceed 2.0825 tons per month.

YEAR: _____

Month	Total HAP Emissions This Month (tons)	Previous 11 Month HAP Emissions (tons)	12 Month Total HAP Emissions (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____